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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

18 AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, AFL-CIO, *et al.*,

20 Plaintiffs,

21 v.

22 DONALD J. TRUMP, in his official capacity as
23 President of the United States, *et al.*,

24 Defendants.

Case No. 3:25-cv-03698

**DECLARATION OF FAITH LEACH
IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY RELIEF**

DECLARATION OF FAITH LEACH

I, Faith Leach, declare as follows:

1. I am over eighteen years old, of sound mind, and fully competent to make this declaration.

2. I am the Chief Administrative Officer of the City of Baltimore (“the City”). I have served in this role since March 2023.

3. In my role, I manage the day-to-day government operations across the entire City enterprise, ensuring the effective, efficient, and equitable delivery of City services.

Background

4. The Mayor and City Council of Baltimore, the City's corporate identity, is a municipal corporation organized pursuant to Articles XI and XI-A of the Maryland Constitution, entrusted with all the powers of local self-government and home rule afforded by those articles. It has the capacity to sue and be sued.

5. Baltimore is the largest city in Maryland and the thirtieth largest city in the United States.

6. In 2023, Baltimore City was home to an estimated 12,400 federal employees.

7. Large scale reductions in force at the federal level would cause significant damage to Baltimore's tax revenues.

8. Due to the reductions in force, the City is providing assistance to these displaced federal employees at its own expense, including job fairs, resume writing assistance, help with obtaining unemployment benefits, interview preparation sessions, and career training sessions.

Current and anticipated effects of federal reductions of force on Baltimore

Federal Emergency Management Agency (FEMA)

9. Baltimore relies on support from the Federal Emergency Management Agency (FEMA), which will be drastically impacted by the reductions in federal force.

10. Baltimore is a coastal city, making it more susceptible to flooding and climate change issues. The cuts to FEMA staff will certainly affect the trainings it provides for

1 floodplain certifications, the support for disaster preparedness planning, and the technical and
2 oversight assistance for Community Assistance Visits (CAVs), which assess how local
3 governments can strengthen their implementation of the National Flood Insurance Program
4 (NFIP), all of which Baltimore City utilizes.

5 11. FEMA also provides useful and necessary assistance when the City experiences
6 emergencies, which it will be far less equipped to do with reductions in staff. In order to obtain
7 FEMA assistance, a disaster declaration must be made, which then allows access to the disaster
8 relief fund. Delays in such a declaration and subsequent fund access could be catastrophic.

9 12. In addition, for inclement weather or infrastructure incidents that are declared an
10 Emergency, Baltimore is reimbursed for the cost of services and equipment associated with the
11 event (i.e. snow removal efforts, infrastructure emergencies, water crisis support, etc.), a process
12 which will certainly be delayed by a reduction in force.

13 13. Baltimore also uses the FEMA Bulletin, which provides critical information about
14 funding opportunities, national emergencies and response efforts, public assistance programs,
15 technical support and training opportunities, guidance and examples of prevention, response,
16 mitigation, and recovery initiatives, and the FEMA Daily Operations Briefing, which provides
17 updates on new or ongoing incidents, hazard monitoring, disaster declaration activity, and event
18 monitoring. Baltimore uses this information to prepare for emergencies, to participate in
19 trainings that enable emergency management officials to save lives in the face of disasters, and to
20 assist people in the aftermath of incidents, among others. A reduction in force could hamper this
21 information sharing if there is insufficient staff at FEMA to gather and publish it.

22 14. Baltimore relies upon trainings provided by FEMA through the National Disaster
23 and Emergency Management University (NDEMU), formerly Emergency Management Institute
24 (EMI) and online independent study courses, trainings that could be cut because of a lack of
25 staff.
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27
28

1 ***Department of Transportation (DOT) and the Federal Highway Administration (FHWA)***

2 15. Baltimore also relied heavily on the Department of Transportation, as well as
3 numerous other federal agencies (including FEMA), after the 2024 tragic collapse of the Francis
4 Scott Key Bridge. The disaster not only resulted in the deaths of six men, but also shut down
5 Baltimore Port operations and cut off a main traffic route through Baltimore. Through a
6 cooperative effort launched between federal, state, and city agencies, the debris was cleared and
7 the Port reopened in an astonishing 78 days. Federal government workers led the cleanup, and
8 the Federal Highway Administration (“FHWA”), a DOT agency, was able to provide the City
9 with \$60 million in “quick relief” funding within hours of its request to help restore initial
10 transportation. In the aftermath, FHWA was also providing technical assistance, conducting site
11 assessments, and administering emergency contracts for the new bridge. A significantly reduced
12 staff would have impaired the speed and efficiency with which the federal government
13 responded.

15 16. The Port supports 8000 workers and has a daily economic impact of \$192 million
16 and \$70 billion per year, and every day of such a closure is nothing short of an economic
17 catastrophe. Baltimore is strongly concerned that in the event of another such disaster, a
18 significantly depleted federal force would not be able to provide sufficient resources and
19 assistance to minimize the devastating impacts of this kind of event.

20 17. In addition to the Key Bridge disaster, FHWA provides important assistance to
21 Baltimore on transportation issues.

22 18. Baltimore receives approximately \$42 million in grants for infrastructure and
23 traffic projects. With staffing cuts at FHWA, all city-related review and approvals requests will
24 be delayed.

25 19. Furthermore, staff reduction at FHWA will reduce their stewardship activities over
26 these projects and others, including technical and program assistance in number of areas.
27

*National Oceanic Atmospheric Administration (NOAA) and the National Weather Service
(NWS)*

20. The services provided by the National Oceanic and Atmospheric Administration (NOAA) are also invaluable to Baltimore as a coastal city and will be detrimentally affected by reductions in force.

21. Baltimore relies upon data provided by NOAA regarding weather, climate and atmospherics changes, including storm surges, sea-level rise projections, flood prediction models and floodplain maps, heat wave projections. It supplies annual emissions estimates used to gauge progress towards the city's carbon neutrality goals. Information from NOAA serves as the backbone for the latest data on climate related risks and threats Baltimore City faces, as detailed in our 2023 Disaster Preparedness and Planning Project (DP3). Without this data, Baltimore would not be able to gauge how sea-level rise, temperature extremes, storm surges and flooding risk may impact Baltimore's communities over the coming decade.

22. NOAA also provides vital technical assistance and expertise on emerging climate risks, such as the possibility of more intense heat waves or less predictable, more erratic weather patterns. These services are all necessary to Baltimore City, as a recent study by the United States Army Corps of Engineers found that “[t]he Baltimore metro region is highly susceptible to flooding, and future storms may result in increased flood risk, economic damages and life safety concerns, not just for tropical storms and hurricanes but also for nor'easters.”

23. In addition to climate issues, Baltimore relies on NOAA and the National Weather Service (NWS) for emergency management. Data from NOAA allows Baltimore to prepare for weather related emergencies in advance and NWS supports training and exercise development with realistic weather maps and scenarios

24. Already, the NWS WEA automatic language translation services have been suspended due to a lapse in contracted services, which impacts Baltimore's ability to reach residents equitably and ensure the fastest response time.

National Institute of Standards and Technology (NIST)

25. Similarly, Baltimore also relies on research and standards from NIST with respect to climate issues.

26. NIST leads technology research and sets national/international standards for key environmental measures such as air quality monitoring, measuring, tracking reporting and reducing the emission of greenhouse gasses, with an explicit focus on urban emission and city-based measurements. As an urban area, this research is particularly useful for Baltimore City in developing plans for addressing combating climate change issues.

Environmental Protection Agency (EPA)

27. Likewise, the EPA is vital to Baltimore City's mission to safeguard life and property from climate-related catastrophes, and a force reduction will negatively impact that.

28. Baltimore City relies upon EPA data related to 1) environmental exposures, 2) enforcement of emissions regulations from mobile and stationary sources, and 3) waste-related data, resources and educational materials.

29. The EPA also provides many data sources, research repositories and analysis on topics that provide insights on the best climate change mitigation and adaptions strategies to pursue.

30. EPA staff supplies direct engagement, providing Baltimore with technical expertise on climate mitigation and adaptation strategies.

31. The City also uses the technical assistance, educational materials, raw data, and best practices shared via the EPA website on myriad topics including air quality, stormwater management, waste, toxic exposures, plus the intersection between public health and climate change. The City also relied upon and utilized EPA materials in several city plans, including Baltimore's 2024 Climate Action Plan.

Department of Energy (DOE)

32. Baltimore also utilizes resources from the DOE that would be affected by a reduction in staff.

1 33. It relies upon direct support from the DOE with navigating energy policy
 2 implementation, such as the State of Maryland's Building Energy Performance Standards and
 3 how local governments can support property owners with compliance.
 4

5 34. The DOE has provided national peer learning opportunities related to various
 6 energy topics to spur innovations in energy conservation, electrification and general
 7 decarbonization.
 8

9 35. Baltimore also uses DOE's data, models and standard methodologies for
 10 assessing the tradeoff of renewable energy projects and infrastructure.
 11

12 36. DOE also explores and funds new energy technologies align with climate goals,
 13 which benefit coastal cities like Baltimore.
 14

Center for Disease Control (CDC)

15 37. Baltimore is already feeling the effects of the reductions in force at the Centers for
 16 Disease Control (CDC).
 17

18 38. With respect to Project Officer support, Baltimore has noticed delayed response
 19 times when seeking programmatic guidance and prior approval feedback. The absence of project
 20 officers may further slow Baltimore's ability to make timely programmatic decisions and will
 21 delay the implementation of important public health programs.
 22

23 39. Baltimore also anticipates potential delays in processing extensions or approvals
 24 by the CDC's Office of Grant Services, which may affect planned activities and timelines.
 25 Baltimore expects data and evaluation support to dwindle as well.
 26

27 40. The City also relies upon CDC reports and data, and in the event of another large-
 28 scale pandemic like COVID, is concerned that the reduction in force will lead to insufficient
 29 support in an emergency situation.
 30

National Institute for Occupational Safety and Health (NIOSH)

31 41. The significant loss of staff from NIOSH, an agency that is part of the Centers for
 32 Disease Control, will affect the safety of Baltimore's first responders, particularly members of
 33 the Baltimore City Fire Department.
 34

1 42. It is the federal institute responsible for conducting research and making
 2 recommendations for the prevention of work-related injury and illness.
 3

4 43. It investigates firefighter fatalities, line of duty death reports, and spearheads
 5 initiatives for cancer reduction for firefighters, all of which will suffer due to a lack of staff.
 6

Occupational Health and Safety Administration (OSHA)

7 44. Similarly, cuts to the force at OSHA threaten the safety and health of employees,
 8 including firefighters.
 9

10 45. OSHA provides training, outreach, education, and assistance and works
 11 collaboratively with Maryland OSHA programs to ensure that they are at least as effective as
 12 federal OSHA programs, furthering a national system of worker safety and health protections.
 13

14 46. OSHA also develops important regulations to ensure employee safety, like those
 15 that govern Self Contained Breathing Apparatuses for firefighters.
 16

The ADA Network

17 47. The ADA Network (overseen by the Administration for Community Living in the
 18 Department of Health and Human Services) provides necessary assistance to Baltimore.
 19

20 48. The Mayor's Commission on Disabilities collaborates with partners at the ADA
 21 National Network. As HHS employees become unavailable to administer contracts, the technical
 22 assistance provided by the ADA Centers will no longer be a resource available to Baltimore and
 23 will reduce the City's ADA-related capacity and expertise.
 24

Department of Housing and Urban Development (HUD)

25 49. Baltimore's housing agencies will also be affected by HUD force reductions.
 26 Reductions/eliminations of HUD field office staff would decimate subject matter expertise on
 27 local conditions and environment that are critical to understanding the needs of the local
 28 community and how it differs fundamentally from other jurisdictions.
 29

30 50. Additional delays (on top of existing delays) in receiving technical assistance and
 31 guidance from HUD staff on any number of topics critical to ensuring Baltimore is following the
 32

myriad federal rules and regulations that govern the Community Development Block Grant (CDBG) and HOME programs.

51. Delays (on top of existing delays) in receiving necessary authorizations from staff (such as Request for Release of Funds RROF)) will impede large-scale capital development projects from moving forward in a timely manner.

52. Staff reductions will also likely impact the Section 108 Loan Program. Local HUD Offices review and provide approval of 108 Loan Agreements before they are provided to the bond division at the central HUD headquarters. Reduction in staff means it is likely that the approval time could be extended for an unknown period of time, which could delay funding the loan and impact the Baltimore's repayment schedule in the event interest rates increase.

53. Additionally, reduced staff could impact opportunities to refinance 108 Loans, again affecting the Baltimore's repayment obligations. Previously, Baltimore has refinanced its 108 loans, which resulted in lower payments and freed up CDBG funds for other uses. Programs and projects funded through 108 Loans are also subject to HUD's environmental review. Reducing staff could extend the time required to receive approval, thereby delaying projects and funding.

Notice and Comment

54. Had Baltimore had been provided with notice of the wide-scale reductions in force and been afforded the opportunity to comment thereon, it would have submitted objections to the plans in light of the likely harms that would be incurred by the City as a result.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct. Executed APRIL 28, 2025 at BALTIMORE CITY, MARYLAND.
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6 Faith Leach
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